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April 24, 2020

Via ECF

Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: *In re Sundial Growers Inc. Securities Litigation*, Master File No. 1:19-cv-08913-ALC

Dear Judge Carter:

We write on behalf of all parties in the above-referenced matter.¹ On April 9, 2020, defendants filed a letter requesting a pre-motion conference in connection with their anticipated motion to dismiss. On April 14, 2020, lead plaintiffs filed their responsive letter and disclosed that they will file an amended complaint by April 30, 2020.

Pursuant to Rule 2.D.i of Your Honor's Individual Practices, defendants hereby state their intention to file a motion to dismiss.

Furthermore, defendants and lead plaintiffs respectfully request Your Honor's approval of the following agreed-upon schedule: Defendants shall file their motion to dismiss by May 27, 2020; lead plaintiffs shall file any opposition to the motion to dismiss by June 23, 2020; and defendants shall file their reply by July 14, 2020.

Respectfully submitted,

/s/ Adam S. Hakki

Adam S. Hakki

cc: Counsel of Record (via ECF)

¹ We represent defendant Sundial Growers Inc. and the individual defendants Torsten Kuenzlen, James Keough, Edward Hellard, Greg Mills, Gregory Turnbull, Lee Tamkee, and Elizabeth Cannon.